

Exhibit H

Patricia Jirak

04/08/2025 TUE 14:47 FAX

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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Knight, et al. v. The Islamic Republic of Iran</i>	18-cv-12398 (GBD)(SN) ECF Case

DECLARATION OF PATRICIA JIRAK

I, Patricia Jirak, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than eighteen (18) years of age and I have personal knowledge of and am competent to testify to the matters stated in this declaration.
2. I was a citizen of the United States on September 11, 2001, and I remain so today.
3. On September 11, 2001, I was present in New York City when the terrorist attacks on the World Trade Center (WTC) occurred. Early that morning, I took the PATH train to the station located under the WTC from Jersey City, New Jersey. I was with a friend in a coffee shop across the street from St. Paul's Chapel when I heard the first plane hit the South Tower.
4. We left the building to get away from the WTC. My friend went north. I walked toward the river to the marina to attempt to get a boat back to New Jersey. I had three dogs in my apartment and I was afraid I would not be able to get back across the river to take care of them. I got to the marina and boarded a ferry. The scene was becoming more and more chaotic. People were running in all directions up and down the river. In the pandemonium, a woman collapsed in front of me on the ferry. I had almost 20 years of experience as an emergency medical technician (EMT) so I began to perform CPR on her. I was not able to save her.

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5. On the New Jersey side of the river, ferryboats, water taxis, and boats of all kinds were arriving from New York. People were coming off the boats covered with dust and soot, many were injured and were bleeding. A staging area for the injured was set up on the pier. People were lying on the ground near the river. There was no one there to help. I stayed for about two hours directing people to phones, public transportation, and ambulances.

6. I decided to go back across the river to New York to see if I could help in the rescue effort. I took a water taxi to the Staten Island Ferry terminal in Lower Manhattan. Another staging area for victims had been set up by the New York Fire Department at the terminal. I showed my EMT credentials to a firefighter and was told to wait there. No one was being brought to the site. After forty-five minutes, I decided to help a group of nurses who were trying to get to St. Vincent's Hospital. We took a tug boat up the river past Ground Zero. Smoke was billowing from the WTC site and there was dust everywhere, but I could not see any people. We got off the boat at 14th Street and I directed the nurses toward St. Vincent's Hospital.

7. I learned that medical personnel were needed at the Chelsea Piers to help the injured and to hand out water and other supplies. Doctors and nurses had set up tables in anticipation of treating the injured, but no was brought in. Sometime after 8:00 that evening, I tried to make my way back to Ground Zero. I was only able to go as far as Chambers Street. Emergency personnel had set up floodlights and were limiting access to the area. I walked back down to the marina and was able to back across the river. I arrived home in New Jersey around 11:00 p.m.

8. The next morning, I returned to New York. I was able to return to the WTC site. Everything was covered with debris, glass, and dust. In places the dust was knee high. Over the next five days I worked in the vicinity of Ground Zero. I assisted emergency personnel by cleaning debris from the southwest triage site to help them set up; providing first aid to the emergency

workers; handing out safety equipment including goggles, gloves, and boots; dispensing other supplies; providing directions to food, water, and other necessities; and serving on the "bucket brigade" removing debris from the WTC site.

9. I witnessed the attacks, the collapse of the towers, the havoc that ensued, as well as the aftermath including the rescue and the recovery operations with the cadaver dogs searching through the rubble. I recall seeing the body bags of partial human remains. It was a horrific and traumatizing experience.

10. One month after my experience on September 11 and the week that followed, I began to become concerned about my health. I began wheezing for the first time in my life. I began to have difficulty completing tasks. I had recently moved and I was unable to unpack my belongings. I seemed to be stuck. I sought medical treatment.

11. In June of 2002, I was informed by an EMS group that I could receive medical monitoring through the World Trade Center Health Program (WTCHP). I contacted the Program to see if there was anything that that could be done in addition to the treatment I was receiving from my private physicians. Over the next 23 years my physical injuries and conditions have been confirmed and treated through the WTCHP. I have been seen by the Program's doctors including specialists in pulmonology, neurology, endocrinology, gynecology, sleep medicine, and psychology.

12. As a result of my exposure to toxic substances on and after 9/11, I have experienced increasing difficulty breathing, walking, and performing most activities of daily life. I tire easily and have recurrent episodes when I cannot swallow and have the sensation of my throat closing. I have also been diagnosed and treated for diabetes, hypertension, and thyroid disease.

13. I continue to receive medical treatment for the injuries I suffered in the immediate aftermath of 9/11. Following the evaluation of my conditions by the WTCHP, I pursued a claim with the VCF and was found eligible for compensation for asthma, chronic airway obstruction, chronic rhinitis, and esophageal reflux. I was also certified for posttraumatic stress disease (PTSD) by the WTC Mental Health Program at the Clinical Center of Excellence at Icahn School of Medicine at Mt. Sinai, and for chronic obstructive pulmonary disease, and obstructive sleep apnea by the WTCHP. A true and correct copy of the VCF eligibility determination letter documenting the physical injuries I suffered from the attacks on 9/11 is submitted with this Declaration as part of this exhibit, as are the WTC Mental Health Program certification of PTSD and my other WTCHP certified injuries.

I DECLARE UNDER PENALTY OF PERJURY that the foregoing is true and correct.

DATED this 8th day of April, 2025.

Patricia Jirak
Declarant Patricia Jirak



September 11th
Victim Compensation Fund

June 5, 2014

PATRICIA JIRAK



Dear Patricia Jirak:

Your Eligibility Form for the September 11th Victim Compensation Fund (VCF) has been reviewed. You submitted an Eligibility Form for Personal Injury Claimants. Your claim number is VCF0019620. The Claims Evaluator determined that your Eligibility Form was substantially complete on June 5, 2014. As stated in the Regulations and on the Eligibility Form, by filing a substantially complete Eligibility Form, you have waived your right to file or be a party to a September 11th-related lawsuit.¹ For more information about this topic, please review Frequently Asked Questions (FAQ) 7.1-7.4 on <http://www.vcf.gov/faq.html>.

The Decision on your Claim

The VCF has determined that you meet the eligibility criteria established in the statute (the Zadroga Act and the original statute) and regulations and therefore the VCF will review your Compensation Form and supporting materials to determine the amount of any award. Based on the information you submitted and information the VCF has received from the World Trade Center Health Program (WTCHP), you have been found eligible for the following injuries:

- ASTHMA, UNSPECIFIED, UNSPECIFIED STATUS
- CHRONIC AIRWAY OBSTRUCTION NEC
- CHRONIC RHINITIS
- ESOPHAGEAL REFLUX
- UNSPECIFIED ASTHMA
- UNSPECIFIED SINUSITIS
- **INJURIES THAT WERE FOUND ELIGIBLE BY THE FIRST ITERATION OF THE SEPTEMBER 11TH VICTIM COMPENSATION FUND THAT OPERATED FROM 2001 TO 2004 ("VCF1")**

For more information regarding the ability to participate in the VCF after submitting a claim in VCF1, please see Frequently Asked Question ("FAQ") 2.12 on the VCF's website. Please note that there are several reasons why an injury that you think should be eligible is not listed above. First, for non-traumatic injuries, the description of the injury is based on the information provided by the WTCHP and there can be several alternative descriptions for the same

¹ The Statute (the Air Transportation Safety and System Stabilization Act as amended by the Zadroga Act) and the Regulations are located at <http://www.vcf.gov/lawRulesOtherDocs.html>.



September 11th
Victim Compensation Fund

injury. Additionally, a WTCHP physician may have provided testing or treatment for an injury even if the WTCHP has not certified that injury for treatment. Finally, your injury may not be listed if it was only recently certified for treatment by the WTCHP. The VCF regularly receives updated information from the WTCHP and will notify you if additional injuries have become eligible.

What Happens Next

The VCF will determine your compensation award based solely on the eligible injuries listed above. In order for the VCF to do so, you must submit the Compensation Form for Personal Injury Claimants and the required supporting documents. If you have not already done so, please submit the Compensation Form and the required supporting documents as soon as possible. You are encouraged to submit the Compensation Form through the VCF's web-based claim system at www.vcf.gov. If you wish to complete the Compensation Form in hardcopy, you may request the form by contacting the toll-free Helpline at 1-855-885-1555. For the hearing impaired, please call 1-855-885-1558 (TDD). If you are calling from outside the United States, please call 1-202-353-0356.

In addition to the Compensation Form, please also complete and submit the VCF ACH Payment Information Form. This form can be found on our website in Section 8 of the FAQs. The completed form must be submitted before the VCF can arrange for any payment.

The VCF will be able to determine your compensation award based on the eligible conditions after all compensation related documents are submitted. When you receive an award letter, you will have the right to appeal. In that appeal, you have the right to assert additional injuries that you believe are eligible and for which you believe you should be compensated. For purposes of the statutory deadlines, the injuries listed in your claim form and the injuries certified as eligible will be deemed "filed". You will receive instructions on the appeal process when you receive the letter with details of your compensation award.

If you have questions about the information in this letter or the claims process in general, please contact our toll-free Helpline at the number noted above. Every effort will be made to respond to your inquiries as soon as possible.

Sincerely,

September 11th Victim Compensation Fund



**World Trade Center Health Program
Clinical Center of Excellence**

Clinic Locations:

345 E. 102nd Street, 2nd Floor • New York, NY 10029

1468 Madison Avenue • New York, NY 10029

Mailing Address:

One Gustave L. Levy Place • Box 1230 • New York, NY 10029

Phone: 212.241.8462 • Fax: 212.241.3381

CONFIDENTIAL

05/25/2023

Ms. Patricia Jirak (2627947),

This letter is intended to inform you that on 04/19/2023, the WTC Mental Health Program at the WTCHP Clinical Center of Excellence at Icahn School of Medicine at Mount Sinai submitted a Request for Certification of Health Conditions for Patricia Jirak (DOB [REDACTED]) to the WTC Health Program Administrator. The certification application included the following conditions:

F43.10 (ICD-10) POSTTRAUMATIC STRESS DISORDER

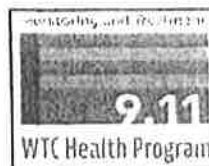
This application was approved for the conditions mentioned above on 05/17/2023. Please do not hesitate to contact us at (212) 241-8462 if you have any questions.

Regards,

A handwritten signature in black ink, appearing to read "Mark Nakhla".

**Mark Nakhla, MD
World Trade Center Faculty Practice Associates
The Mount Sinai School of Medicine**

WTC Health Program
PO Box 7002
Rensselaer, NY 12144



Patricia Jirak
PO BOX 30087
New York, New York 10011

Re: 911015054

05/24/2023

Dear Patricia Jirak:

This letter is to inform you that after reviewing medical information provided by the Mount Sinai School of Medicine (MSSM), the World Trade Center (WTC) Health Program has certified the following health condition(s) as covered for treatment benefits:

Date of Certification	Condition Category on List of WTC-Related Health Conditions*	Certification Category or Injury
4/19/2023	Mental Health	Please Contact your WTC Physician for Specific Information

* As listed in the James Zadroga 9/11 Health and Compensation Act of 2010 and/or 42 C.F.R. § 88.15

Our records also indicate that you are currently certified for the following health condition(s) as covered for treatment benefits:

Date of Certification	Condition Category on List of WTC-Related Health Conditions*	Certification Category or Injury
7/1/2011	Asthma	Obstructive Airway Disease Please Contact your WTC Physician for Specific Information
7/1/2011	Chronic Rhinosinusitis	Upper Respiratory Disease Please Contact your WTC Physician for Specific Information
7/1/2011	Gastroesophageal Reflux Disease (Gerd)	Gastroesophageal Reflux Disease Please Contact your WTC Physician for Specific Information
7/1/2011	WTC-Exacerbated Chronic Obstructive Pulmonary Disease (COPD)	Obstructive Airway Disease Please Contact your WTC Physician for Specific Information

* As listed in the James Zadroga 9/11 Health and Compensation Act of 2010 and/or 42 C.F.R. § 88.15

In addition, the following health condition(s) medically associated with your WTC-related health condition(s) have also been certified as covered for treatment benefits:

Date of Certification	Condition Category on List of WTC-Related Health Conditions*	Medically Associated Condition
11/13/2015	Medically Associated to Chronic Rhinosinusitis	Obstructive sleep apnea
11/13/2015	Medically Associated to Gastroesophageal Reflux Disease (Gerd)	Obstructive sleep apnea

* As listed in the James Zadroga 9/11 Health and Compensation Act of 2010 and/or 42 C.F.R. § 88.15

The WTC Health Program will only provide payment for medically necessary treatment(s) authorized by your WTC Health Program physician for your certified health condition(s) by a WTC Health Program participating provider.

If you would like more information or believe that a health condition is missing, incorrect, or should be removed, please discuss this with the Mount Sinai School of Medicine (MSSM) at 212-241-1554. If the information in this letter is correct, no further action is necessary.

If you have any other questions, you may contact the WTC Health Program at 1-888-982-4748 Monday through Friday, 9 AM to 5 PM (Eastern Time Zone).

Sincerely,



John Howard, M.D.,
 Administrator, World Trade Center Health Program
 Copy to: Director, Clinical Center of Excellence